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*Attorneys for Plaintiff Action Target Inc.*

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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ACTION TARGET INC., a Delaware  
corporation,

Plaintiff,

vs.

RANGE STRATEGIES, LLC, a Nevada  
Limited Liability Company;  
PAUL LAFRANCE, an individual; and DOES  
1-5,

Defendants.

**STIPLUATED INJUNCTION AND  
ORDER DISMISSING CASE WITH  
PREJUDICE AND RETAINING  
JURISDICTION TO ENFORCE  
INJUNCTION AND SETTLEMENT  
AGREEMENT**

**Case No:2:16-cv-00084-DAK**

**Judge: Dale A. Kimball**

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Plaintiff Action Target Inc., (“Action Target”) and defendants Range Strategies, LLC (“Range Strategies”) and Paul LaFrance (“LaFrance”) (collectively “Defendants”), have represented to the Court that the parties have entered into a Settlement Agreement and Release (“Settlement Agreement”) resolving this action. Being fully advised, acting on the joint motion

of the parties, and for good cause appearing, it here hereby ORDERED, ADJUDGED AND DECREED as follows:

**PERMANENT INJUNCTION**

1. The Court has jurisdiction over the action and personal jurisdiction over the parties pursuant to 35 U.S.C. §§ 271, 283 and 284, and 28 U.S.C. §§ 1331 and 1338(a), and pendant jurisdiction pursuant to 28 U.S.C. § 1367.

2. Pursuant to Rule 65(d) Fed. R. Civ. P., Defendant Paul LaFrance is hereby prohibited, for the period of twenty-four (24) months immediately following the date of this Order, from:

(a) Directly or indirectly soliciting or servicing in any way, on behalf of Paul LaFrance, or on behalf of or in conjunction with others, any current or prospective customer serviced or solicited by Action Target or its affiliates;

(b) Hiring or attempting to hire, on behalf of Paul LaFrance or others, any employee or agent of Action Target or its affiliates;

(c) Alienating any employee or agent from Action Target or its affiliates or otherwise interfering or attempting to interfere with the relationship between Action Target or its affiliates and any of their employees or agents; and

(d) Competing with Action Target or its affiliates, either directly or indirectly, in any matter or area in which Action Target or its affiliates do or did scientific, technological or product research, development, manufacturing, business development, sales or marketing during the period of LaFrance's employment with Action Target.

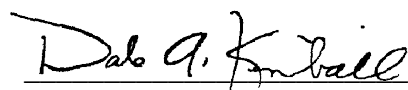
3. Pursuant to Rule 65(d) Fed. R. Civ. P., Defendant Range Strategies, LLC, Paul LaFrance and each of their respective officers, agents, servants and employees, and any others who are or may be in active concert or participation with Defendants, are hereby ORDERED to refrain from any infringement of U.S. Patent No. 6,994,348, entitled "Dueling Tree" (the '348 Patent). The order contained in this Section 3 shall remain effective for the life of the '348 Patent.

4. Pursuant to Rule 41(a)(1), the Court having considered the Joint Motion for Entry of Permanent Injunction and Order Dismissing the Case and good cause appearing, it is hereby ORDERED, ADJUDGED AND DECREED that the above-entitled action and all claims asserted therein are dismissed with prejudice, with each of the parties to bear his or it own costs and fees except as to any terms set forth in the Settlement Agreement.

5. It is further ORDERED AND DECREED that this Court retains jurisdiction over the case and the parties for the purpose of enforcing the terms of the foregoing injunction and the Settlement Agreement between the parties without the necessity to file a new action.

DATED THIS 22d day of March, 2016.

**BY THE COURT**

  
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Dale A. Kimball  
United States District Judge

Approved as to form:

**SNOW CHRISTENSEN & MARTINEAU**

/s/ Keith A. Call  
Keith A. Call  
Sara W. Matthews  
*Attorneys for Action Target Inc.*

**THORPE, NORTH & WESTERN**

/s/ Jed Hansen  
Jed Hansen (*w/permission via 3/21/2016 email*)  
Attorneys for Paul LaFrance  
and Range Strategies, LLC